

**EXHIBIT 2**

**PLAINTIFF’S P.R. 4-3(a)(2) CLAIM CONSTRUCTION CHART  
IDENTIFYING SUPPORTING EVIDENCE**

<b>Disputed Claim Term/ Phrase/ Clause for Claim Construction</b>	<b>Plaintiff’s Proposed Claim Construction</b>	<b>Supporting Intrinsic Evidence<sup>1</sup></b>
<p><b>“corresponding to”</b> as used in the phrase “cursor image data corresponding to a/said specific image”</p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, 53.</p>	<p>“associated with”</p>	<p><i>KeyMe, LLC v. Hillman Grp., Inc.</i>, No. CV 19-1539-LPS, 2021 WL 243252, at *7 (D. Del. Jan. 25, 2021) (“At the hearing, Hillman also agreed that “corresponds to” is synonymous with “is associated with”).</p> <p>`102 Patent, 3:4-14; `102 Patent, 17:62 to 18:3.</p>
<p><b>“cursor display code”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53.</p>	<p>“computer code for modifying the display of the cursor image”</p>	<p>`102 Patent, Abstract; `102 Patent, Figure 5; `102 Patent, 8:52-57.</p>

---

<sup>1</sup> All references to the Asserted Patents are related to the `102 Patent unless otherwise noted.

## EXHIBIT 2

Disputed Claim Term/ Phrase/ Clause for Claim Construction	Plaintiff's Proposed Claim Construction	Supporting Intrinsic Evidence <sup>1</sup>
<p><b>“cursor display instruction”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53; `241 Patent, Claim 35.</p>	<p>“an instruction operable to modify the display, in conjunction with other information, of a cursor image”</p>	<p>`102 Patent, Abstract; `102 Patent, Fig. 4; `102 Patent, 8:52-62; `102 Patent, 10:23-41.</p>
<p><b>“cursor image” and “initial cursor image”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53; `241 Patent, Claim 35.</p>	<p>“the appearance of the cursor on a user’s screen before the cursor image is modified into the specific image”</p> <p>(Plaintiff contends that the terms “cursor image” and “initial cursor image” should be construed together and to mean the same thing.)</p>	<p><i>Lexos Media IP, LLC v. APMEX, Inc.</i>, No. 216CV00747JRGRSP, 2017 WL 1021366, at *2–4 (E.D. Tex. Mar. 16, 2017).</p> <p>`102 Patent, Abstract. `102 Patent, 3: 4-15. `102 Patent, 7:5-15.</p>
<p><b>“cursor image data”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53.</p>	<p>Plain and ordinary meaning.</p>	

## EXHIBIT 2

Disputed Claim Term/ Phrase/ Clause for Claim Construction	Plaintiff's Proposed Claim Construction	Supporting Intrinsic Evidence <sup>1</sup>
<p><b>“modifying [an initial cursor image]”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claim 53.</p> <p><b>“transforming [said initial cursor image]”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claim 53.</p> <p><b>“modify [said cursor image]”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53.</p> <p><b>“modifying [a cursor image]”</b></p> <p><i>See</i> `449 Patent, Claims 1 and 35; `241 Patent, Claim 35.</p>	<p>“changing (change) or replacing (replace) the form, shape or appearance of a cursor image”</p>	<p>`102 Patent, Abstract;  `102 Patent, Figs. 7-9;  `102 Patent, 4:4-12;  `102 Patent, 3:51-57;  `102 Patent, 9:15-20;  `102 Patent, 9:10:37-41;  `102 Patent, 11:34-37;  `102 Patent, 11:49-61.</p>

## EXHIBIT 2

Disputed Claim Term/ Phrase/ Clause for Claim Construction	Plaintiff's Proposed Claim Construction	Supporting Intrinsic Evidence <sup>1</sup>
<p><b>“server” (computer or system)</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53; `241 Patent, Claim 35.</p>	<p>“one or more pieces of computer equipment and the software running on the equipment used to provide services for one or more other computers or computing devices”</p>	<p><i>SimpleAir, Inc. v. Google, Inc.</i>, No. 2:13-CV-0937-JRG, 2015 WL 1906016, at *13 (E.D. Tex. Apr. 27, 2015).</p> <p>`102 Patent, Figure 2.</p>
<p><b>“specific image”</b></p> <p><i>See</i> `102 Patent, Claim 72; `449 Patent, Claims 1, 38, and 53.</p>	<p>a “modified cursor image,” and not the “cursor image” or the “initial cursor image”</p>	<p><i>Lexos Media IP, LLC v. APMEX, Inc.</i>, No. 216CV00747JRGRSP, 2017 WL 1021366, at *2 (E.D. Tex. Mar. 16, 2017).</p> <p>`102 Patent, Abstract.  `102 Patent, 2:58-62;  `102 Patent, 3:4-10;  `102 Patent, 3:48-50;  `102 Patent, 3:62 to 4:3;  `102 Patent, 7:7-9.</p>
<p><b>“tracks a movement”</b></p> <p><i>See</i> `241 Patent, Claim 35.</p>	<p>“moves according to a movement”</p>	<p>`102 Patent, 9:39-65  `102 Patent, 16:14-20.</p>